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Redacted – For Public Inspection

March 31, 2000

Ex Parte Submission

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

MAR 31 2000

OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271
of the Telecommunications Act of 1996 to Provide In-Region,
InterLATA Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Attached, at the direct request of Commission staff, are a chart and supporting material detailing a recalculation of SWBT's reported performance for manual rejects of electronically submitted local service requests ("LSRs") during November and December 1999, and January 2000, to more accurately reflect SWBT's performance. As discussed in the Reply Affidavit of Candy Conway, results for Performance Measures 10.1 and 11.1 (which measure the time required for SWBT to return manual rejects electronically to the CLEC) were adversely affected in December and January (and to a minimal extent in November) as a result of SWBT's efforts to clear very old LSRs that were shown in pending status in the LASR GUI interface, but related to orders that already had been completed. See Conway Reply Aff. ¶¶ 27-28. In other words, the performance measurements counted rejects on LSRs for orders that already had been filled.

This issue arose in part because CLECs sometimes send a supplemental LSR before the original LSR is processed. SWBT's systems cease processing the original request in light of the completion of work based on the later LSR, but – until recently – the original LSR continued to be included in SWBT's records of pending LSRs. Likewise, in the past, SWBT sometimes manually processed and completed an order based on an LSR that fell out for manual handling, but the LSR was not cleared from the system.

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List A B C D E

Prior to the phase-in of the LASR GUI enhancement during the late spring and early summer of 1999 (*see* Ham Aff. ¶¶ 147-150), all rejects were handled manually. LSRs that are manually handled but do not require any action are moved to a “null” bucket within LASR, which removes the LSR from a service representative’s work screen but not from LASR itself. SWBT’s system administrators cleared this “null” bucket in a one-time clean-up during late 1999 and into early 2000, by sending rejects back to the appropriate CLECs over LASR GUI. Thereafter, the Local Service Center (“LSC”) implemented a process to avoid such late rejections of stale LSRs. LSC personnel now contact a system administration group to have old LSRs that do not require any work removed from the LASR GUI queue without the need for sending expired reject notices. *See* Conway Reply Aff. ¶ 28.

When the rejects of expired LSRs sent in May, June, and July were calculated into the December and January performance measures, the result was a dramatic increase in the average reject interval (PM 11.1) and a reduction in the percent of rejects returned within 5 hours (PM 10.1). Reported performance thus reflected an apparently significant deterioration, even though the CLECs did not experience any real-world increase in reject intervals on active LSRs.

The fact that these results are aberrations, and have nothing to do with SWBT’s actual performance or the actual reject intervals experienced by the CLECs in December and January, is confirmed by two facts. First, in February, SWBT’s mean time to return a manual reject was approximately 7 business hours, as compared to 35 hours in December and 28 hours in January. While the average interval for February is slightly above the Texas PUC’s 5 business-hour benchmark, it compares very favorably to Bell Atlantic-New York’s 24 clock-hour benchmark, for example. *See Bell Atlantic New York Order* ¶ 164.

Second, SWBT has compared its manual rejects for December and January to orders issued in the months of May, June, and July. As the attached spreadsheets demonstrate, SWBT was able to confirm that at least 98 percent of the rejects reported in December and January resulted from LSRs that were submitted in May, June, and July, and relate to order(s) that were processed in those months. Thus, SWBT has recalculated the manual reject results for PM 11.1 in November, December, and January to indicate what they would have been without the rejects that relate to LSRs submitted in May, June, and July. The supporting spreadsheets are being filed under seal since they provide CLEC specific information.

It is important to note once again that the LASR GUI “clean up” was strictly an administrative, internal procedure, which did not affect the processing of any active LSRs.

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Magalie Roman Salas, Esq.

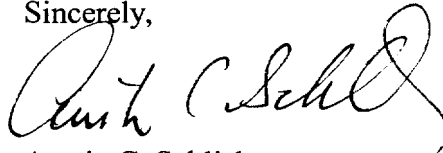
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The Commission should also be aware that SWBT's aggregated Texas performance tracking/chart results for February 2000 (filed on March 23) corrected a clerical, typographical error in the initial (January 2000) reporting of a single percentage under PM 115-06 (SWBT-Caused Delayed Coordinated Cutovers—Frame Due Time—LNP with Loop) for the month of January 2000. As stated in the tracking/chart results for the 12 months ending February 2000, the percentage of frame due time cutovers delayed by 60 minutes in January was 2.3 percent (not 3.2 percent, as had been stated in the report for the 12 months ending January 2000, which was filed on February 25, 2000). No other entries for PM 115 (or other hot cut performance measures) were affected by this correction. This clerical mistake in the February 25 filing, not any change in the underlying data, accounts for the discrepancy identified on page 4 of AT&T's March 13, 2000 ex parte concerning hot cuts.

The original and two copies of this letter are enclosed. Please let me know if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin C. Schlick", written in a cursive style.

Austin C. Schlick

cc: Mr. Stanley
Ms. Rosenworcel
Ms. Stephens
Ms. Wright
Ms. Farroba, Texas PUC
Ms. Heisler, DOJ
ITS

Adjustment of PM 11.1 for LASR GUI Clean-Up

